



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CK/LXN
F.#2010R01079

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 7, 2012

By Federal Express & ECF

Joel S. Cohen, PC
225 Broadway, Suite 1203
New York, NY 10007

Re: United States v. Chang
Criminal Docket No. 11-0067 (S-2) (SJ)

Dear Mr. Cohen:

Enclosed please find two binders and one CD containing the government's continued discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government hereby also requests reciprocal discovery.

The materials include:

- (a) Two binders containing documents that appear to be original Taishin Bank statements which were found in the defendant's office at St. John's University and documents that purport to be Taishin Bank statements for the same time period which were submitted to St. John's University for reimbursement (127819-128730). The documents were previously produced in electronic form on February 22, 2012. The binders also include a table of contents, which reflects the government's current understanding of the documents.
- (b) Documents relating to students who had scholarships at St. John's University through the defendant (129158-129948);
- (c) A blank invoice from "H&J Travel Enterprise, Inc." (128994). Approximately 20 of these blank invoices were found in the defendant's offices at St. John's University;

- (d) Additional documents relating to Taischin bank (129156-129617); and
- (e) Calendars showing student work schedules (128995-129096).

If you have any questions or further requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney
Eastern District of New York

By: /s/
Charles Kleinberg
Lan Nguyen
Assistant U.S. Attorneys
(718) 254-6012/6162

Enclosures

CC: Clerk of Court (SJ) (w/o enclosures)